

US EPA ARCHIVE DOCUMENT

Enbridge Energy, Limited Partnership  
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September 27, 2012

Mr. Ralph Dollhopf  
Federal On-Scene Coordinator and  
Incident Commander  
U.S. Environmental Protection Agency  
801 Garfield Avenue, #229  
Traverse City, MI 49686

RE: Directive to Maintain Control Point at Ceresco Dam  
Enbridge Line 6B MP 608 Marshall, MI Pipeline Release

Dear Mr. Dollhopf:

Enbridge Energy, Limited Partnership (Enbridge) acknowledges receipt of your Directive dated September 25<sup>th</sup>, 2012 which requires the continued placement and maintenance of containment boom at the Ceresco Dam control point. While Enbridge intends to fully comply with this directive, we would like to clarify several of the points presented in your letter.

- The vast majority of the sheen currently observed at Ceresco is due to the churning of bottom sediments by the boats responsible for debris removal along the containment boom or the sheen recovery boats themselves. With lower water temperatures spontaneously generated sheen is minimal and the current conditions are very similar to those found back in June of 2012 when the United States Environmental Protection Agency (U.S. EPA) first authorized the removal of the control point.
- Enbridge agrees with the U.S. EPA that 3,897 bags of debris were collected at Ceresco for the period from August 1, 2012 to September 19, 2012. To expand on that, from July 7, 2012 when the boom was re-installed, until September 25, 2012, 6,395 bags were collected, each weighing approximately 25 lbs. Therefore, nearly 80 tons of natural occurring vegetation has been removed from the river system over this short period. Vegetation that is not contaminated until coming in contact with sheen while it is being held back by the containment boom. As double bagging is required, 12,790 plastic bags were taken to the local landfill over this same period from this one location.
- Over the summer, there has been little physical evidence that sheen going over Ceresco Dam has had any significant impact on the river system downstream. While no readily available model exists that can predict the behavior of oil sheens in a turbulent flow over a dam, dispersion and dissolution of surface oil into the water column in turbulent conditions is a well-known phenomenon. It is very likely that small amounts of oil sheen going over the dam will fully disperse and any weathered oil is not likely to re-coalesce further downstream. Any residual should make its way to sediment traps which have been located throughout the system as planned and approved by the U.S. EPA and Michigan Department of Environmental Quality (MDEQ).

The Directive states that the condition for removal of this containment is when "no oil sheen and/or globule manifestations" occur. Enbridge does not agree with these criteria and maintains that under the current circumstances, the Ceresco Dam control point is doing more environmental harm than good. Decisions regarding removal should be based on impacts to the public and the environment and not just river aesthetics.

Sincerely,

ENBRIDGE ENERGY, LIMITED PARTNERSHIP  
By Enbridge Pipelines (Lakehead) L.L.C.  
Its General Partner

A handwritten signature in black ink, appearing to read "R. Adams", followed by a long horizontal line extending to the right.

Richard Adams  
Vice President, U.S. Field Operations

CC: Mark Durno, U.S. EPA  
Michelle DeLong, MDEQ  
John Sobojinski, Enbridge  
Mark Curwin, Enbridge